

Additionally, this case involves an important and complex area of law: the application of statutes and constitutional provisions that prohibit sex discrimination to transgender individuals. Proper consideration of these issues requires explication of, among other things, precedent about discrimination based on sex stereotypes, the application of other antidiscrimination statutes to transgender persons, and recent statements of the Department of Justice and the Department of Education regarding the application of Title IX to transgender students generally, and to restroom usage specifically.

Finally, permitting Plaintiff leave to file an oversize brief will not prejudice the Defendant, because Plaintiff will not object to Defendant filing a brief of similar length.

Dated: June 11, 2015

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION
OF VIRGINIA FOUNDATION, INC.

/s/

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**Pro hac vice* motion to follow

Dated: June 11, 2015